

# EXHIBIT I

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

## UNITED STATES DISTRICT COURT

for the  
District of Vermont

2018 APR 17 PM 3:41

CLERK

BY

DEPUTY CLERK

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)90 Mail Parcels,  
more particularly described in Attachment A.

Case No. 2:18-MJ-34

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A.

located in the \_\_\_\_\_ District of \_\_\_\_\_ Vermont, there is now concealed (identify the person or describe the property to be seized):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):


- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section  
21 U.S.C. §§ 841(a)(1) & 846Offense Description  
Possessing with intent to distribute, distributing, and conspiring to possess with intent to distribute and to distribute, controlled substances.

The application is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.
  
 Applicant's signature  
 Jonathan Dunham, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date:

04/17/2018

City and state: Burlington, Vermont

  
 Judge's signature  
 Hon. John M. Conroy, U.S. Magistrate Judge

Printed name and title

## **AFFIDAVIT**

I, Jonathan Dunham, after being duly sworn, depose and state as follows:

### **INTRODUCTION AND BACKGROUND**

1. I am a Postal Inspector employed by the U.S. Postal Inspection Service and assigned to the Boston Division. The Boston Division has responsibility for Postal Inspection Service investigations in Massachusetts, New York, Vermont, Connecticut, New Hampshire, Maine, and Rhode Island. I have been employed by the Inspection Service for one year, and am currently assigned to the Burlington, Vermont Domicile.
2. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. §2510(7), in that I am empowered by law to conduct investigations and to make arrests for federal offenses.
3. My training and experience includes a Bachelor of Science degree in Criminal Justice, a Bachelor of Art degree in Psychology, a certificate in Homeland Security, and a Master's degree in Criminal Justice from Westfield State University; Postal Inspector Basic Training at Potomac, Maryland; and Postal Inspector Post-Basic Training at Burlington, Vermont. During the course of my employment with the Postal Inspection Service, I have conducted or participated in criminal investigations, including incidents where the U.S. Mail was used for the purpose of possessing with intent to distribute, distributing, and conspiring to possess with intent to distribute and to distribute, controlled substances, in violation of Title 21, U.S.C. §§ 841(a)(1) and 846.
4. The information contained in this affidavit is based upon my personal observations, my training and experience, my own investigation, and the investigation of other law

enforcement officers, including but not limited to, Homeland Security Investigations (HSI) Agent Jamie West, with whom I have consulted.

5. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for the search warrant, it does not set forth every fact that I or others have learned during the course of this investigation.

#### **ITEMS TO BE SEARCHED**

6. I submit this affidavit in support of an application for a warrant to search the following parcels (hereinafter referred to as the Subject Parcels):
  - U.S. Priority Mail parcel number **9505516135078093209376**, mailed to “Keith Bustard, 109 W. Holston Ave APT 1, Johnson City, TN 37604-5555,” from sender “David Gagnon, 504 Railroad Street, Bethlehem, NH 03574” (“Subject Parcel #1”), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #1 weighs 0 pounds, 3 ounces and is further described in Attachment A.
  - U.S. Priority Mail parcel number **9505516135078093209345**, mailed to “Chris Brendler, 3160 Lawndale Rd, Finksburg, MD 21048,” from sender “David Gagnon, 504 Railroad Street, Bethlehem, NH 03574” (“Subject Parcel #2”), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #2 weighs 0 pounds, 3 ounces and is further described in Attachment A.
  - U.S. Priority Mail parcel number **9505516135078093209338**, mailed to “Marshall Letchworth, 635 Madison 3225, Witter, AR 72776,” from sender “David Gagnon, 504 Railroad Street, Bethlehem, NH 03574” (“Subject Parcel #3”), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #3 weighs 0 pounds, 3 ounces and is further described in Attachment A.

- U.S. Priority Mail parcel number **9505516135078093209390**, mailed to "Samuel Hingst, 12 Roseville Rd, Westport, CT 06880," from sender "David Gagnon, 504 Railroad Street, Bethlehem, NH 03574" ("Subject Parcel #4"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #4 weighs 0 pounds, 3 ounces and is further described in Attachment A.
- U.S. Priority Mail parcel number **9505516135078093209352**, mailed to "John Driscoll, 147 Wallins Corners Rd. APT 9, Amsterdam, NY 12010" from sender "David Gagnon, 504 Railroad Street, Bethlehem, NH 03574" ("Subject Parcel #5"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #5 weighs 0 pounds, 3 ounces and is further described in Attachment A.
- U.S. Priority Mail parcel number **9505516135078093209369**, mailed to "Jay Smith, 606 Cherry St, Janesville, WI 53548" from sender "Kenneth Leavitt, 18 Oak Hill Ave APT 2, Littleton, NH 03561" ("Subject Parcel #6"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #6 weighs 0 pounds, 3 ounces and is further described in Attachment A.
- U.S. Priority Mail parcel number **9505516135078093209406**, mailed to "Ryan Angelone, 26 Balance Rock Rd. APT 17" from sender "Kenneth Leavitt, 18 Oak Hill Ave APT 2, Littleton, NH 03561" ("Subject Parcel #7"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #7 weighs 0 pounds, 3 ounces and is further described in Attachment A.
- U.S. Priority Mail parcel number **9505516135078093209383**, mailed to "John Kivicky, 1341 East Avenue APT 2F, Berwyn, IL 60402-4486" from sender "Kenneth Leavitt, 18 Oak Hill Ave APT 2, Littleton, NH 03561" ("Subject Parcel #8"), for evidence or

instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #8 weighs 0 pounds, 3 ounces and is further described in Attachment A.

- U.S. First-Class parcel number **9500116135078093209434**, mailed to "Matthew McElyea, 1475 Georgetown Road, Christiana, PA 17509" from sender "Kenneth Leavitt, 18 Oak Hill Ave APT 2, Littleton, NH 03561" ("Subject Parcel #9"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #9 weighs 0 pounds, 1 ounce and is further described in Attachment A.
- U.S. First-Class parcel number **9500116135078093209472**, mailed to "John Driscoll, 147 Wallins Corners Rd. APT 9, Amsterdam, NY 12010" from sender "Kenneth Leavitt, 18 Oak Hill Ave APT 2, Littleton, NH 03561" ("Subject Parcel #10"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #10 weighs 0 pounds, 1 ounce and is further described in Attachment A.
- U.S. First-Class parcel number **9500116135078093209427**, mailed to "Scott Hayes, 5406 Plantation Pine Dr. Knoxville, TN 37921" from sender "Kenneth Leavitt, 18 Oak Hill Ave APT 2, Littleton, NH 03561" ("Subject Parcel #11"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #11 weighs 0 pounds, 1 ounce and is further described in Attachment A.
- U.S. First-Class parcel number **9500116135078093209489**, mailed to "Cory Meunier, 1231 Hemlock Drive, Southaven, MS 38671" from sender "Kenneth Leavitt, 18 Oak Hill Ave APT 2, Littleton, NH 03561" ("Subject Parcel #12"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #12 weighs 0 pounds, 1 ounce and is further described in Attachment A.

- U.S. First-Class parcel number **9500116135078093209465**, mailed to "Francisco Cernas, 1626 W. 38th St. Los Angeles, CA 90062" from sender "Kenneth Leavitt, 18 Oak Hill Ave APT 2, Littleton, NH 03561" ("Subject Parcel #13"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #13 weighs 0 pounds, 1 ounce and is further described in Attachment A.
- U.S. First-Class parcel number **9500116135078093209458**, mailed to "Jonah Crema, 70 Everett Ave, Providence RI 02906-4207" from sender "Kenneth Leavitt, 18 Oak Hill Ave APT 2, Littleton, NH 03561" ("Subject Parcel #14"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #14 weighs 0 pounds, 1 ounce and is further described in Attachment A.
- U.S. First-Class parcel number **9500116135078093209441**, mailed to "Steve Moore, 527 Cedar St. APT 4, San Antonio, TX 78210" from sender "Kenneth Leavitt, 18 Oak Hill Ave APT 2, Littleton, NH 03561" ("Subject Parcel #15"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #15 weighs 0 pounds, 1 ounce and is further described in Attachment A.
- U.S. First-Class parcel number **9500116135078093209410**, mailed to "Andy Siks, 10 Kent Way, Byfield, MA 01922" from sender "Kenneth Leavitt, 18 Oak Hill Ave APT 2, Littleton, NH 03561" ("Subject Parcel #16"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #16 weighs 0 pounds, 1 ounce and is further described in Attachment A.
- U.S. First-Class parcel number **9500116135078093209496**, mailed to "Zach Huevel, 165 Mary Street, Gray, TN 37615" from sender "Kenneth Leavitt, 18 Oak Hill Ave APT 2, Littleton, NH 03561" ("Subject Parcel #17"), for evidence or instrumentalities of

violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #17 weighs 0 pounds, 1 ounce and is further described in Attachment A.

- U.S. First-Class parcel number **9500112967718093117881**, mailed to "Zac Robinson, 4012 Churchill Dr. Flower Mound, TX 75028" from sender "James Weiss 2170 RT 114, East Burke, VT 05832" ("Subject Parcel #18"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #18 weighs 0 pounds, 0.4 ounces and is further described in Attachment A.
- U.S. First-Class parcel number **9500112967718093117911**, mailed to "Joseph Wyman 974 Waverly Way NE, Atlanta, GA 30307" from sender "James Weiss 2170 RT 114, East Burke, VT 05832" ("Subject Parcel #19"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #19 weighs 0 pounds, 0.4 ounces and is further described in Attachment A.
- U.S. First-Class parcel number **9500112967718093117904**, mailed to "Elliott Hoth, 7777 St. RT 30, Paul Smiths, NY 12970" from sender "James Weiss 2170 RT 114, East Burke, VT 05832" ("Subject Parcel #20"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #20 weighs 0 pounds, 0.7 ounces and is further described in Attachment A.
- U.S. First-Class parcel number **9500112967718093117935**, mailed to "Guest Craig Davies 4000 Summit Blvd, Atlanta, GA 30319" from sender "James Weiss 2170 RT 114, East Burke, VT 05832" ("Subject Parcel #21"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #21 weighs 0 pounds, 0.5 ounces and is further described in Attachment A.

- U.S. First-Class parcel number **9500112967718093117973**, mailed to "John Byard, P.O. Box 581 Ames, IA 50010" from sender "James Weiss 2170 RT 114, East Burke, VT 05832" ("Subject Parcel #22"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #22 weighs 0 pounds, 0.5 ounces and is further described in Attachment A.
- U.S. First-Class parcel number **9500112967718093117966**, mailed to "Adam Mesenbrink, 22 W. Center St. #1306, Orem, UT 84057" from sender "James Weiss 2170 RT 114, East Burke, VT 05832" ("Subject Parcel #23"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #23 weighs 0 pounds, 0.4 ounces and is further described in Attachment A.
- U.S. First-Class parcel number **9500112967718093117959**, mailed to "Corey Soto, 127 South Main Street, South Toms River, NJ 08757" from sender "James Weiss 2170 RT 114, East Burke, VT 05832" ("Subject Parcel #24"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #24 weighs 0 pounds, 0.5 ounces and is further described in Attachment A.
- U.S. First-Class parcel number **9500112967718093117898**, mailed to "Brandon Zarillo, 12633 SE 102nd Ave, Belleview, FL 34420" from sender "James Weiss 2170 RT 114, East Burke, VT 05832" ("Subject Parcel #25"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #25 weighs 0 pounds, 0.6 ounces and is further described in Attachment A.
- U.S. First-Class parcel number **9500112967718093117928**, mailed to "G. Khale, 1501 Atlas Rd, Wheeling, WV 26003" from sender "James Weiss 2170 RT 114, East Burke, VT 05832" ("Subject Parcel #26"), for evidence or instrumentalities of violations of Title

21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #26 weighs 0 pounds, 0.5 ounces and is further described in Attachment A.

- U.S. First-Class parcel number **9500112967718093117942**, mailed to "Derick Robinson, 113 Victor Ct. APT 3, Greer, SC 29651" from sender "James Weiss 2170 RT 114, East Burke, VT 05832" ("Subject Parcel #27"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #27 weighs 0 pounds, 0.4 ounces and is further described in Attachment A.
- U.S. Priority Mail parcel number **9114901159818561693971**, mailed to "Jones Baranowski, 1318 Pickens Street APT A2, Columbia, SC 29201" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #28"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #28 is further described in Attachment A.
- U.S. Priority Mail parcel number **EG747708391US**, mailed to "Tee Chang, 502 N. 9th St, Collinsville, OK 74021" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #29"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #29 weighs 0 pounds, 2.0 ounces is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207778**, mailed to "Adam Westman, 106 W. Minnesota St, Brookhaven, MS 39601" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #30"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #30 is further described in Attachment A.

- U.S. First-Class parcel number **9114901496451814207754**, mailed to "Andrew Grohs, 809 N. West Ave APT 118, Sioux Falls, SD 57104-5734" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #31"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #31 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207693**, mailed to "Lewis Brill, 3 Oak Ridge Court, Voorhees, NJ 08043" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #32"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #32 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207730**, mailed to "Mike Jones, 5415 Sasha Court, Williamsburg, VA 23188" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #33"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #33 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207716**, mailed to "Adam Westman, 106 W. Minnesota St, Brookhaven, MS 39601" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #34"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #34 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207594**, mailed to "Cody Smith, 4902 N. Macdill Ave APT 1916, Tampa FL 33614-8203" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #35"), for evidence or

instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #35 is further described in Attachment A.

- U.S. mailed envelope, mailed to "Gary Goode, P.O. Box 1073 Covington, VA 24426-5073" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #36"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #36 is further described in Attachment A.
- U.S. mailed envelope, mailed to "Evan Gnagey, 17036 S Eaden Rd, Oregon City, OR 97045-8673" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #37"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #37 is further described in Attachment A.
- U.S. mailed envelope, mailed to "Anthony Awaida, P.O. Box 932, Palo Alto, CA 94302" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #38"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #38 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207228**, mailed to "Jacob Averbuck, 628 Waverley St. #C, Palo Alto, CA 94301" from sender "James B. Weiss 2170 Rte. 114, East Burke, VT 05832" ("Subject Parcel #39"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #39 is further described in Attachment A.
- U.S. Priority Mail parcel number **9505510122678085228190**, mailed to "Sam Bent, P.O. Box 22, East Burke, VT 05832" from sender "John Pearson 9040 W. End Rd, Arcata, CA 95521" ("Subject Parcel #40"), for evidence or instrumentalities of violations of Title 21



U.S.C. §§ 841(a)(1), and 846. Subject Parcel #40 weighs 1 pound 11 ounces and is further described in Attachment A.

- U.S. Priority Mail parcel number **9505514104898094220639**, mailed to "Sam Bent, P.O. Box 22, East Burke, VT 05832" from sender "Derek Balmer, 1978 Ward St, Arcata, CA 95521" ("Subject Parcel #41"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #41 weighs 1 pound 12 ounces and is further described in Attachment A.
- U.S. mailed envelope number **RRR118395893PL**, mailed to "Sam Bent, P.O. Box 22, East Burke, VT 05832" from sender "Yanexus sp. Zo.o, Ul. Wyzwolenia 122b, 85-790 Bydgoszcz, Poland" ("Subject Parcel #42"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #42 is further described in Attachment A.
- U.S. Priority Mail parcel number **9114999944314090368870**, mailed to "Sam Bent, P.O. Box 22, East Burke, VT 05832" from sender "John Iglesias, 370 9th Ave, San Francisco, CA 94114" ("Subject Parcel #43"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #43 is further described in Attachment A.
- U.S. Priority Mail parcel number **9114999944313576780892**, mailed to "Sam Bent, P.O. Box 22, East Burke, VT 05832" from sender "Full O' Life, 2515 W. Magnolia Blvd, Burbank, CA 91505-3030" ("Subject Parcel #44"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #44 weighs 3 pounds 0 ounces and is further described in Attachment A.

- U.S. mailed envelope number **RRR148158646PL**, mailed to "Sam Bent, P.O. Box 22, East Burke, VT 05832" from sender "Xantum, Kopernika 9a, 05-120 Legionowo, Poland" ("Subject Parcel #45"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #45 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207532**, mailed to "Walter Karlins 6614 Stirrup Ct, Eldersburg, MD 21784" from sender "James B. Weiss 2170 Rte. 114, East Burke, VT 05832" ("Subject Parcel #46"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #46 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207280**, mailed to "Sean Michael, 489 Cardinal Road, Barnwell, SC 29812" from sender "James B. Weiss 2170 Rte. 114, East Burke, VT 05832" ("Subject Parcel #47"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #47 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207273**, mailed to "Ian Karoway, 220 South Quinsigamond Ave, Shrewsbury, MA 01545" from sender "James B. Weiss 2170 Rte. 114, East Burke, VT 05832" ("Subject Parcel #48"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #48 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207518**, mailed to "Joseph Wyman, 974 Waverly Way NE, Atlanta, GA 30307" from sender "James B. Weiss 2170 Rte. 114, East Burke, VT 05832" ("Subject Parcel #49"), for evidence or instrumentalities of

violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #49 is further described in Attachment A.

- U.S. First-Class parcel number **9114901496451814207556**, mailed to "Elijah Joshua Mizell, 8330 Vietor Ave APT 214, Elmhurst, NY 11373" from sender "James B. Weiss 2170 Rte. 114, East Burke, VT 05832" ("Subject Parcel #50"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #50 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207570**, mailed to "Kenneth Mooney, 1256 State Route 31, Lebanon, NJ 08833-3238" from sender "James B. Weiss 2170 Rte. 114, East Burke, VT 05832" ("Subject Parcel #51"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #51 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207259**, mailed to "Brawley Patton, 1020 East 45th Street APT 103, Austin, Texas 78751" from sender "James B. Weiss 2170 Rte. 114, East Burke, VT 05832" ("Subject Parcel #52"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #52 is further described in Attachment A.
- U.S. First-Class parcel number **9114999944314728128791**, mailed to "Harrison Reid, 5001 Alpine Ridge Dr. Columbia, MO 65202-9824" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #53"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #53 is further described in Attachment A.

- U.S. First-Class parcel number **9114999944314728128821**, mailed to "Vadim Gaponenko, Box 2196, 200 Campus Dr. Grove City College, Grove City, PA 16127" from sender "Shawn Larocque, 1536 Old Silo Rd, Saint Johnsbury, VT 05819" ("Subject Parcel #54"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #54 is further described in Attachment A.
- U.S. First-Class parcel number **9114999944314728128807**, mailed to "Edwin Cornejo 43185 Katama SQ, Chantilly, VA 20152-4417" from sender "Shawn Larocque, 1536 Old Silo Rd, Saint Johnsbury, VT 05819" ("Subject Parcel #55"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #55 is further described in Attachment A.
- U.S. First-Class parcel number **9114999944314728128838**, mailed to "Matt Sussdorff, 4095 New London Rd, Forest, VA 24551" from sender "Shawn Larocque, 1536 Old Silo Rd, Saint Johnsbury, VT 05819" ("Subject Parcel #56"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #56 is further described in Attachment A.
- U.S. First-Class parcel number **9114999944314728128814**, mailed to "Doriano, 138-12 28th Rd, Flushing, NY 11354" from sender "Shawn Larocque, 1536 Old Silo Rd, Saint Johnsbury, VT 05819" ("Subject Parcel #57"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #57 is further described in Attachment A.
- U.S. Priority Mail parcel number **9505515375968099094337**, mailed to "Pat Gordon, 144 McCullough Road, Mocksville, NC 27028" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #58"), for evidence or instrumentalities of

violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #58 weighs 0 pounds 3 ounces and is further described in Attachment A.

- U.S. Priority Mail parcel number **9505515375968099094351**, mailed to "Alexander Diya, 19 Brittany Ln. A03, Stuarts Draft, VA 24477" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #59"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #59 weighs 0 pounds 3 ounces and is further described in Attachment A.
- U.S. Priority Mail parcel number **9505515375968099094320**, mailed to "Illirik Smirnov, 617 B Sykes St, Chapel Hill, NC 27516" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #60"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #60 weighs 0 pounds 3 ounces and is further described in Attachment A.
- U.S. Priority Mail parcel number **9505515375968099094344**, mailed to "Tiffany Baker, 211 NE 34 CT, Oakland Park, FL 33334" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #61"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #61 weighs 0 pounds 3 ounces and is further described in Attachment A.
- U.S. First-Class parcel number **9500115375968099094372**, mailed to "Jacob Elliott, 1207 4th Ave APT 2, Rockford, IL 61104" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #62"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #62 weighs 0 pounds 1 ounce and is further described in Attachment A.

- U.S. First-Class parcel number **9500115375968099094365**, mailed to "Cody Sechler 411 Patterson St, China Grove, NC 28023" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #63"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #63 weighs 0 pounds 2 ounces and is further described in Attachment A.
- U.S. First-Class parcel number **9500115375968099094389**, mailed to "Jeff Kidd, 8902 Venezia Plantation Dr, Orlando, FL 32829-8109" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #64"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #64 weighs 0 pounds 1 ounce and is further described in Attachment A.
- U.S. First-Class parcel number **9500115375968099094396**, mailed to "Andrew Cassady, 1226 N 46th Ave E, Duluth, MN 55804" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #65"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #65 weighs 0 pounds 1 ounce and is further described in Attachment A.
- U.S. First-Class parcel number **9500115375968099094402**, mailed to "Ryan Oas, 111980 Riverview Rd. NE, Hanover, MN 55341" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #66"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #66 weighs 0 pounds 1 ounce and is further described in Attachment A.
- U.S. Priority Mail parcel number **9114901496451814207792**, mailed to "Nicholas Gill, P.O. Box 7159, Tempe, AZ 85281" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #67"), for evidence or instrumentalities of

violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #67 is further described in Attachment A.

- U.S. Priority Mail parcel number **9114901496451814207815**, mailed to "Frank Leary, 67 Eber Ave, Akron, OH 44305" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #68"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #68 is further described in Attachment A.
- U.S. Priority Mail parcel number **9114901496451814207839**, mailed to "Lamar Gibson, 55 Harrison Circle, Covington, GA 30016" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #69"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #69 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207891**, mailed to "Shawn Backwood, 2904 E. Louisville St, Broken Arrow, OK 74014" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #70"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #70 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207952**, mailed to "Andrew Kaye, 439 Springwater Ln, New Canaan, CT 06840" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #71"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #71 is further described in Attachment A.

- U.S. First-Class parcel number **9114901496451814207914**, mailed to "Joseph Calvin, 160 N. Ross Street APT #1326D" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #72"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #72 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207877**, mailed to "Eduardo Calderon, 8 Daisy Lane, Weedsport, NY 13166" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #73"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #73 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207938**, mailed to "Ryan Fees, 1342 Seneca St, Pottsville, PA 17901" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #74"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #74 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207853**, mailed to "Bob Griffin, 2005 Greenbrier Blvd #16, Clearwater, FL 33760" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #75"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #75 is further described in Attachment A.
- U.S. First-Class parcel number **9114901496451814207976**, mailed to "Stephen Cox, 9240 E Hillery Way, Scottsdale, AZ 85260" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #76"), for evidence or instrumentalities of

violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #76 is further described in Attachment A.

- U.S. First-Class parcel number **9114901496451814207990**, mailed to "Blake A Smalley, 200 S Jackson St, Cerro Gordo, IL 61818" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #77"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #77 is further described in Attachment A.
- U.S. Priority Mail parcel number **9505515602868097140474**, mailed to "Thomas Brown, 1155 Turkey Creek Rd, Langley, KY 41645" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #78"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #78 weighs 0 pounds 6 ounces and is further described in Attachment A.
- U.S. Priority Mail parcel number **9505515602868097140467**, mailed to "Chris Sewell, 4125 Henry Knox Way, Knoxville, TN 37920" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #79"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #79 weighs 0 pounds 3 ounces and is further described in Attachment A.
- U.S. Priority Mail parcel number **9505515602868097140450**, mailed to "Harrison Reid 5001 Alpine Ridge Dr. Columbia, MO 65202" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #80"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #80 weighs 0 pounds 3 ounces and is further described in Attachment A.

- U.S. Priority Mail parcel number **9505515602868097140443**, mailed to "Andrew De Large, 6680 Sabado Tarde Rd. Unit B, Santa Barbara, CA 93117" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #81"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #81 weighs 0 pounds 3 ounces and is further described in Attachment A.
- U.S. Priority Mail parcel number **9505515602868097140429**, mailed to "Foster Smith, 301 W. Hampton Ave, Honea Path, SC 29654" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #82"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #82 weighs 0 pounds 3 ounces and is further described in Attachment A.
- U.S. Priority Mail parcel number **9505515602868097140436**, mailed to "William Thompson, 6086 Netherton St, Centreville, VA 20120-3228" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #83"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #83 weighs 0 pounds 3 ounces and is further described in Attachment A.
- U.S. First-Class parcel number **9500115602868097140518**, mailed to "Dylan Van Wingerden, 1304 S Denver Ave, Boise, Idaho 83706" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #84"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #84 weighs 0 pounds 1 ounce and is further described in Attachment A.
- U.S. mailed envelope, mailed to "Jonathan Cleveland, 115 W. Monument Ave. #101 Dayton, OH 45402" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT

- 05819" ("Subject Parcel #85"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #85 is further described in Attachment A.
- U.S. First-Class parcel number **9500115602868097140501**, mailed to "Devin Francois, 132 South Main Street APT 1, Ellenville, NY 12428" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #86"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #86 weighs 0 pounds 1 ounce and is further described in Attachment A.
  - U.S. First-Class parcel number **9500115602868097140495**, mailed to "Thomson Yeh, Human Dx, 2700 19th St, San Francisco, CA 94110" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #87"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #87 weighs 0 pounds 1 ounce and is further described in Attachment A.
  - U.S. First-Class parcel number **9500115602868097140488**, mailed to "Matt Davis, PO Box 1040, Centreville, VA 20122" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #88"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #88 weighs 0 pounds 1 ounce and is further described in Attachment A.
  - U.S. First-Class parcel number **9500115602868097140532**, mailed to "Brandy Vanhyning, 316 E Center St, Loraine, IL 62349" from sender "David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819" ("Subject Parcel #89"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #89 weighs 0 pounds 1 ounce and is further described in Attachment A.

- U.S. First-Class parcel number **9500115602868097140549**, mailed to “Delfin Paris, 333 West Hubbard 2J, Chicago, IL 60654” from sender “David Jensen, 130 Harvey St, Saint Johnsbury, VT 05819” (“Subject Parcel #90”), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #90 weighs 0 pounds 1 ounce and is further described in Attachment A.
7. The parcels are presently in the possession of the U.S. Postal Inspection Service at 8 New England Drive, Essex Junction, VT 05452

**PROBABLE CAUSE**

8. On April 3, 2018, I executed an affidavit in support of a parcel search warrant. A copy of that Affidavit is attached hereto as Exhibit 1, and incorporated herein. As Exhibit 1, explained, the residence located at 3585 Darling Hill Road, East Burke, Vermont, appeared to be associated with illegal shipments of controlled substances.
9. Exhibit 1 suggested that Djeneba Bent appeared to reside at the Darling Hill residence, and had recently engaged in the attempted distribution of controlled substances through the United States mail while living there. In addition to the information contained in Exhibit 1, evidence of Djeneba Bent residing at the property also included:
- a. During my examination of trash from the property described in Exhibit 1 at paragraph 13, I also observed domestic mail parcels addressed to “Sam Bent P.O. Box 22 East Burke, VT 05832”, “Sam Bent 3585 Darling Hill Road East Burke, VT 05832”, and “The Lovely Djeneba Bent P.O. Box 22 East Burke, VT 05832-0022”.
  - b. Agent West also observed the RI-registered Accord which Djeneba Bent drove to deliver the mail parcels to the Littleton, NH Post Office as described in Exhibit 1 at paragraph 15, at the property on the following dates and times: March 19, 2018 at

approximately 4:30 p.m., March 20, 2018 at approximately 1:00 p.m., March 30, 2018 at approximately 3:30 p.m., and on April 5, 2018 at approximately 5:00 a.m.

10. On April 10, 2018, HSI executed a search warrant issued by this Court in connection with this investigation at the residence located at 3585 Darling Hill Road, East Burke, Vermont. During the execution of the search HSI encountered Djeneba Bent, as well as a male identified as Sam Bent. Sam and Djeneba Bent stated they are cousins. During an interview with Sam Bent on April 10, 2018, Bent advised HSI Special Agent West that Bent was involved in the online ordering and distribution of various controlled substances, including cocaine, MDMA, and others. He subsequently confirmed to HSI agents that Djeneba Bent regularly shipped the packages containing the substances Sam Bent was distributing through the United States Mail. Sam Bent did not confirm that Djeneba Bent was aware of the contents of these packages.

11. Pursuant to the warrant that issued pursuant to the application of which Exhibit 1 was a part, a total of six parcels were searched. Five of the packages were found to contain suspected controlled substances and one contained what is believed to be homemade alcohol or moonshine. The contents of each parcel is described below.

- a. Subject Parcel #1 was found to contain a white mylar bag labeled "Dried Organic Fruit". This bag was found to contain a vacuum sealed bag which contained approximately 3.7 grams of green leafy substance that field tested positive for marijuana.
- b. Subject Parcel #2 was found to contain a white mylar plastic bag labeled "Organic Dried Fruit". This bag was found to contain a vacuum sealed bag containing



approximately 1.9 grams of a thick brown substance that field tested positive for marijuana.

- c. Subject Parcel #3 was found to contain a white mylar bag labeled "Dried Organic Fruit". This bag was found to contain a vacuum sealed bag containing approximately 1.9 grams of a light colored powdery substance that based on color, texture and packaging, was suspected to be heroin.<sup>1</sup>
- d. Subject Parcel #4 was found to contain two mason jars containing suspected homemade alcohol.
- e. Subject Parcel #5 was found to contain a white mylar bag labeled "Dried Organic Fruit". This bag was found to contain a vacuum sealed bag containing 4.4 grams of a green leafy substance that field tested positive for marijuana.
- f. Subject Parcel #6 was found to contain a white mylar bag labeled "Dried Organic Fruit". This bag was found to contain a vacuum sealed bag containing 3.2 grams of a green leafy substance that is suspected to be marijuana.

12. I have also learned that the LSD ordered online and received by an HSI agent in New York, as described in Exhibit 1 at paragraph 17, was contained in an envelope with the "Organic dried fruit" labeling, similar to what was found in 5 of the 6 packages described above. As mentioned in Exhibit 1, that LSD purchase was paid for using Bitcoin as payment. As Exhibit 1 explains in paragraph 16, the Property is also associated with a Post Office Box 22,

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<sup>1</sup> On April 10, 2018, HSI Agent West showed a picture of the contents of above-referenced Subject Parcel #3 to Sam Bent. Bent identified it as powder MDMA (known to me to be a slang term for Methylenedioxymethamphetamine, a controlled substance). Agent also advised the substance in this parcel also matched in appearance a substance found at Bent's residence which later field tested positive for MDMA.

East Burke, Vermont, to which international packages had recently been addressed, and which appeared to contain heroin (per positive field test).<sup>2</sup>

13. As explained in Exhibit 1, at paragraph 14, on March 28, 2018, a photograph of Djeneba Bent was circulated to Postmasters in northern Vermont.
14. On April 03, 2018, Postmaster John Robie of the Littleton, NH Post Office reported that Djeneba Bent came into the post office and mailed multiple parcels, described further in Attachment A as subject parcels 1-17. Clerk Nathan Morse was able to take a picture of Djeneba Bent making the transaction.
15. On April 03, 2018, Clerk Lisa Smith at the Lyndonville, VT Post Office reported that Djeneba Bent mailed 10 parcels, described further in Attachment A as subject parcels 18-27.
16. On April 05, 2018, Clerk Kristianne Liberty of the Lyndon, VT Post Office reported a female who appeared to be the same female as in the circulated photograph of Djeneba Bent mailed multiple parcels, described further in Attachment A as subject parcels 28-38.
17. On April 05, 2018, East Burke Postmaster Nancy Cote, reported subject parcel 39 was being returned to sender and looked very similar to the parcels Djeneba Bent had been mailing. The return address also matched one that Djeneba Bent had been using frequently. Cote also reported subject parcels 40-45 as being addressed to Sam Bent at P.O. Box 22. On or about April 10, 2018 Sam Bent informed Agent West that Bent was expecting a package from Europe containing 162 grams of MDMA, a package from California containing 3 ounces of cocaine, and a package from California containing 2 pounds of marijuana. On or about April

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<sup>2</sup> On April 10, 2018, Sam Bent informed Agent West that Bent believed this substance is hash and denied buying or selling heroin.

12, 2018, Agent West showed Sam Bent a photograph of Subject Parcel 45, and Bent said it might be the shipment of MDMA.

18. On March 29, 2018, Cote reported that Clerk Traci McDowell of the West Burke, VT Post Office told her Djeneba Bent mailed multiple parcels, described further in Attachment A as subject parcels 46-52. Djeneba Bent was seen driving a vehicle with a Rhode Island license plate number CN117.
19. On April 06, 2018, Clerk Lillian Jenks of the Lower Waterford, VT Post Office reported a the woman who was in the circulated photograph of Djeneba Bent mailed multiple parcels on April 5, described further in Attachment A as subject parcels 53-57. Jenks saw Djeneba Bent driving a gray Honda with a Rhode Island plate CN117.
20. On April 09, 2018, Postmaster Diane McCoy of the Danville, VT Post Office reported the same woman who had mailed the parcels described in paragraph 11 had mailed the parcels, described further in Attachment A as subject parcels 58-66.
21. On April 09, 2018, Clerk Louonne Tomasko of the East Saint Johnsbury, VT Post Office reported the woman who was in the circulated photograph of Djeneba Bent mailed multiple parcels, described further in Attachment A as subject parcels 67-77.
22. On April 07, 2018, Supervisor Aaron Whitcomb of the Saint Johnsbury, VT Post Office reported that Djeneba Bent mailed multiple parcels, described further in Attachment A as subject parcels 78-90. Whitcomb also stated that Djeneba Bent was seen driving a silver Honda Accord, with Rhode Island license plate number CN117.
23. I also know from my training and experience the following:
  - a. Drug traffickers mailing controlled substances frequently use U.S. Postal Service Priority Mail Express and Priority Mail services to ship unlawful controlled

substances, and the recipients of those unlawful drugs often use U.S. Postal Service Priority Mail Express and Priority Mail services to ship the proceeds of the illegal sale of controlled substances. These controlled substances and the proceeds of the illegal sale of controlled substances are often found during parcel investigations and interdictions.

- b. Drug traffickers use U.S. Postal Service Priority Mail Express and Priority Mail services because of the reliability of delivery, speed of delivery, low cost, the customer's ability to track the package's shipment online, as well as the low risk of detection by law enforcement. Shippers using Priority Mail Express and Priority Mail services pay for the benefit of being able to confirm the delivery of the parcel by checking the U.S. Postal Service internet website or calling a toll free number.
- c. Drug traffickers who mail controlled substances, and the drug purchasers who send payment in the form of cash or other drugs, often use false or incomplete information in labeling the parcels, as well as dated information. In this way, drug traffickers can distance themselves from the package containing controlled substances or from the proceeds of the sale of the controlled substances in the event the package is intercepted by law enforcement.

#### CONCLUSION

- 24. I respectfully submit that, pursuant to 18 U.S.C. § 3103a(b), there is "reasonable cause to believe that providing immediate notification of the execution of the warrant may have an adverse result." Providing notice to the anticipated recipients of the Subject Parcels would seriously jeopardize the ongoing investigation. Depending on the results of the search, law enforcement will be considering an undercover delivery of one or more of the packages, and

the possibility of additional search warrants. A disclosure would give subjects of the investigation an opportunity to destroy evidence, change patterns of behavior, notify co-conspirators, conduct financial transactions to hide assets, and/or flee from prosecution.

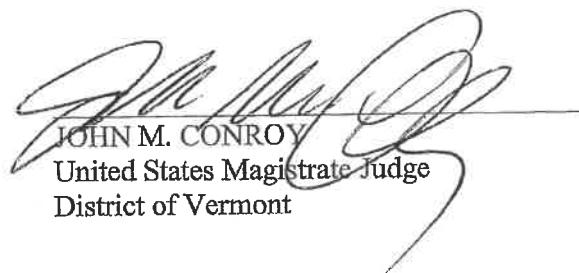
25. It is further requested that the Court authorize execution of this warrant at any time of day or night, as the Subject Parcels are in law enforcement custody.

26. Based on the foregoing, I believe that there is probable cause to search the six Subject Parcels for evidence or instrumentalities of violations of 21 U.S.C. §§ 841(a)(1) and 846.

27. Dated at Burlington, in the District of Vermont, this 17<sup>th</sup> day of April 2018.

  
JONATHAN DUNHAM  
U.S. Postal Inspector

Subscribed and sworn to before me this 17<sup>th</sup> day of April 2018.

  
JOHN M. CONROY  
United States Magistrate Judge  
District of Vermont

**AFFIDAVIT**

I, Jonathan Dunham, after being duly sworn, depose and state as follows:

**INTRODUCTION AND BACKGROUND**

1. I am a Postal Inspector employed by the U.S. Postal Inspection Service and assigned to the Boston Division. The Boston Division has responsibility for Postal Inspection Service investigations in Massachusetts, New York, Vermont, Connecticut, New Hampshire, Maine, and Rhode Island. I have been employed by the Inspection Service for one year, and am currently assigned to the Burlington, Vermont Domicile.
2. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. §2510(7), in that I am empowered by law to conduct investigations and to make arrests for federal offenses.
3. My training and experience includes a Bachelor of Science degree in Criminal Justice, a Bachelor of Art degree in Psychology, a certificate in Homeland Security, and a Master's degree in Criminal Justice from Westfield State University; Postal Inspector Basic Training at Potomac, Maryland; and Postal Inspector Post-Basic Training at Burlington, Vermont. During the course of my employment with the Postal Inspection Service, I have conducted or participated in criminal investigations, including incidents where the U.S. Mail was used for the purpose of possessing with intent to distribute, distributing, and conspiring to possess with intent to distribute and to distribute, controlled substances, in violation of Title 21, U.S.C. §§ 841(a)(1) and 846.
4. The information contained in this affidavit is based upon my personal observations, my training and experience, my own investigation, and the investigation of other

law enforcement officers, including but not limited to, Homeland Security Investigations (HSI) Agent Jamie West, with whom I have consulted.

5. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for the search warrant, it does not set forth every fact that I or others have learned during the course of this investigation.

#### **ITEMS TO BE SEARCHED**

6. I submit this affidavit in support of an application for a warrant to search the following parcels (hereinafter referred to as the Subject Parcels) which were placed in the U.S. mail at the Danville, VT Post Office on March 29, 2018:

a. U.S. First-Class parcel number **9500115375968088093256**, mailed to "Fred LeJeune, 1936 Lombard Street, New Orleans, LA 70122," from sender "William Currier, 462 Railroad Street, Saint Johnsbury, VT 05819" ("Subject Parcel #1"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #1 weighs 0 pounds, 0.40 ounces and is further described in Attachment A.

b. U.S. First-Class parcel number **9500115375968088093270**, mailed to "Brian Carlberg, 12737 Saint Andrews Drive, Kansas City, MO 64145-1146" from sender "William Currier, 462 Railroad Street, Saint Johnsbury, VT 05819" ("Subject Parcel #2"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #2 weighs 0 pounds, 0.40 ounces and is further described in Attachment A.

c. U.S. First-Class parcel number **9500115375968088093263**, mailed to "Kodus Hollon, 170 Ashley Creek Drive, Newnan, GA 30263" from sender "William Currier, 462 Railroad Street, Saint Johnsbury, VT 05819" ("Subject Parcel #3"), for evidence or

instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #3 weighs 0 pounds, 0.40 ounces and is further described in Attachment A.

d. U.S. Priority Mail parcel number **9505515375968088093303**, mailed to "David Perez, 208 Cartwell Drive, Virginia Beach, VA 23452-1422," from sender "William Currier, 462 Railroad Street, Saint Johnsbury, VT 05819" ("Subject Parcel #4"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #4 weighs 3 pounds, 14.20 ounces and is further described in Attachment A.

e. U.S. Priority Mail parcel number **9505515375968088093297**, mailed to "Alex Guariglia, 491 Vizcay Way, Davenport, FL 33837-2618," from sender "William Currier, 462 Railroad Street, Saint Johnsbury, VT 05819" ("Subject Parcel #5"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #5 weighs 0 pounds, 2.60 ounces and is further described in Attachment A.

f. U.S. Priority Mail parcel number **9505515375968088093280**, mailed to "Jonathan Tipton, 426 Elgin Street, Mooringsport, LA 71060-8960," from sender "William Currier, 462 Railroad Street, Saint Johnsbury, VT 05819" ("Subject Parcel #6"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #6 weighs 0 pounds, 2.60 ounces and is further described in Attachment A.

7. The parcels are presently in the possession of the U.S. Postal Inspection Service at 8 New England Drive, Essex Junction, VT 05452.

#### **PROBABLE CAUSE**

8. On March 30, 2018, Agent West relayed the following information to me as it related to the case prior to my involvement:



a. U.S. Postal Inspector Kristin Miller discovered, and informed Agent West that a large quantity of U.S. Postal Service (USPS) Priority Mail shipping boxes had been ordered and received at P.O. Box 22 at the East Burke, Vermont, Post Office ("P.O. Box 22"). Based on my training and experience, I'm aware that shippers of contraband items often order shipping boxes through the mail. According to the application for P.O. Box 22, it is registered to Tracy Baker of 3585 Darling Hill Road, East Burke, VT. The application also lists Sammy Bent, Isabella Sepulveda-Muniz, Chelsea Baker, and Sammy Bent Jr. as additional names authorized to accept mail at P.O. Box 22.

b. Baker listed a vehicle with a Vermont license plate DSK573 on the application for P.O. Box 22. Based on Department of Motor Vehicle ("DMV") records, Agent West found that this vehicle is a 2013 Blue Honda CRV and is registered to Tracy Baker. Agent West also obtained Baker's DMV photograph.

c. On March 19, 2018, Agent West observed a Honda CRV matching the description of Baker's vehicle, and a Honda Accord with a RI license plate number CN117 in the driveway of 3585 Darling Hill Road, East Burke, VT 05851.

d. On March 20, 2018, Agent West saw the Honda CRV at the East Burke, VT Post Office. He also saw a white female matching the description of Tracy Baker, based on the review of Baker's DMV photograph. Later that day he also observed the previously observed Honda Accord and Honda CRV at the same residence. Later that day, Agent West spoke to Postmaster Nancy Cote at the East Burke, VT Post Office. Cote stated that P.O. Box 22 received multiple international and domestic parcels. The international parcels were small and square while some of the domestic parcels were from California, and larger in size. Clerk Sean O'Connor at East Burke, VT Post Office stated he did not see Tracy Baker mail any parcels from

East Burke but saw her ship parcels at other Post Offices in the area. O'Conner primarily works at the North Concord, VT Post Office and occasionally will assist in other offices such as, but not limited to Lyndonville, VT; and East Burke, VT. Postmaster Cote stated she never saw Sam Bent but she saw a woman who identified herself as the sister of Tracy Baker's boyfriend. The woman was described as possibly African American. Cote informed Agent West that an international parcel from Poland was delivered to P.O. Box 22 on March 19, 2018.

9. On March 23, 2018, Agent West, Inspector Miller, and I went to the East Burke, VT Post Office and spoke with Clerk Rebecca Johnson. Johnson stated that she only saw Tracy Baker once at the East Burke, VT Post Office.

10. I later received a call from Postmaster Carmen Riendeau of Orleans, VT Post Office and was informed that Clerk Imre Bogar reported that on March 22, 2018, a woman shipped eight parcels with fictitious return addresses. Clerk Bogar identified the return addresses as fictitious because he was aware the listed streets did not exist in the listed towns. The parcels were shipped the previous night.

11. On March 26, 2018, Cote emailed me a picture of a parcel addressed to Djeneba Bent being delivered to PO Box 22. I sent the information to Agent West, who then obtained a DMV photo of Djeneba Bent. Agent West traveled to Orleans, VT Post Office and showed Bogar the photo of Djeneba Bent. Bogar informed Agent West that he was 95 percent sure it was the same female who had mailed the parcels on March 22, 2018.

12. On March 27, 2018, Agent West drove past 3585 Darling Hill Road, East Burke, VT, and observed the trash at the roadside in a black receptacle. Agent West and I met at the West Burke Town Office and went to the Lyndonville, VT Post Office and spoke to Clerk Lisa Smith-Bean. After being shown the picture of Djeneba Bent, Smith-Bean stated that she thought

Djeneba Bent received international parcels at a PO Box in the past, but now she comes in about once a month to mail out parcels.

13. Later that day Agent West and I met with an employee from the West Burke recycling center. After verifying that the collection bay of the trash collection vehicle was empty, Agent West accompanied the employee in his trash collection vehicle. I followed behind the trash collection vehicle in my unmarked Law Enforcement Vehicle (LEV) and witnessed the employee approach the black trash receptacle in front of the residence at 3585 Darling Hill Road, East Burke, VT. The employee removed two trash bags from the receptacle and put them in the empty collection bay of the truck. I then followed the truck approximately half a mile down the road and took possession of the trash. The trash collection vehicle made no additional stops after collecting the trash from 3585 Darling Hill Road, East Burke, VT. Agent West then entered my LEV, and I brought him back to his LEV, located at the West Burke Town Office. I followed Agent West to the St. Johnsbury, VT State Police (VSP) barracks. Agent West and I examined the contents of the two trash bags and discovered, among other items, three rubber gloves, and three opened shipping envelopes from Spain. One of the three envelopes was addressed to Sam Bent at P.O. Box 22. A clear plastic baggie containing an unknown white residue was also discovered. The baggie and residue were transported to the Vermont Forensic Laboratory for testing.

14. On March 28, 2018, I emailed a photo of Djeneba Bent to Post Office Operation Manager (POOM) Jerome Reen. I requested Reen disseminate the photo to various Postmasters in the northern VT area, and to notify me if anyone saw her mailing parcels out of their Post Offices. In response to my request, I was informed that Djeneba Bent reportedly mailed multiple

parcels from Littleton, NH; Danville, VT; West Burke, VT; Lower Waterford, VT; Lyndonville, VT; and St. Johnsbury, VT.

15. Postmaster John Robie, of the Littleton, NH Post Office stated Djeneba Bent was seen at the Littleton, NH Post Office the same day her picture was emailed out by Reen. She mailed two Priority Mail boxes and "several" small manila envelopes. She used an address with an incorrect zip code, and corrected it after the clerk alerted her of the error. She used the return address of Wayne Switser, 46 Cottage Street, Littleton, NH 03561. She was seen driving a gray Honda, RI plate number CN117. The Postmaster emailed me a picture of the parcels which were shipped, and a picture he took of the license plate of the vehicle used by Djeneba Bent which matched the one reported by Agent West seen on the Accord at 3585 Darling Hill Road, East Burke, VT.

16. On March 29, 2018, I met Agent West at the East Burke, VT Post Office to conduct an extended border search on two international parcels from Spain for P.O. Box 22. Both parcels had stamps originating from Spain, and matched the appearance to the three opened envelopes discovered in the trash of the Darling Hill Road residence on March 27, 2018. Both parcels contained two vacuum sealed bags which contained a dark thick substance. The evidence was secured and transported to the VSP Barracks in Derby, VT. The vacuum sealed bags from one of the parcels weighed approximately 26.6 grams. It should be noted that the vacuum sealed bags were marked in ink with "20" and "5". Sergeant Sean Loan with the VSP VT Drug Task Force ran multiple field tests on the substance. The substance tested positive for heroin, and negative for Tetrahydrocannabinol (THC).

17. On March 29, 2018, Clerk Karen Rice of the Danville, Vermont Post Office, emailed me to report that Djeneba Bent shipped six parcels at the Danville, VT Post Office that

day. These subject parcels are further described in Attachment A. The return address on all the parcels was William Currier 462 Railroad St., Saint Johnsbury, VT 05819. This return address was familiar to law enforcement. According to Agent West, HSI in NY were conducting an undercover investigation involving the online order and purchase using bitcoin, of approximately \$70 worth of Lysergic Acid Diethylamide (LSD). On March 13, 2018, in response to an order placed by an undercover HSI agent as part of the investigation, Special Agents (SA) with HSI in NY seized a mail parcel containing suspected LSD blotter paper tabs. The return address on the label was William Currier 462 Railroad St., Saint Johnsbury, VT 05819.

18. Agent West contacted the U.S. Postal Service (USPS) Carrier for the route that includes 462 Railroad Street who explained that he was unsure if a person named Currier lived at the address. The Carrier explained that 462 Railroad Street is an apartment building. He further explained that in the past, he has not delivered mail addressed to William Currier at 462 Railroad Street because of his concerns that Currier does not live there.

19. On March 30, 2018, Lyndonville Postal Clerk Smith-Bean reported that Djeneba Bent shipped two parcels from the Lyndonville, VT Post Office. Inspector Miller retrieved parcels mailed by Djeneba Bent from Lyndonville, VT; Danville, VT; and West Burke, VT. Inspector Miller also collected a parcel, which arrived at East Burke, VT Post Office for PO Box 22 in the name Sam Bent. All mentioned parcels are now being held at the Postal Inspection Service Office, located at 8 New England Drive, Essex Junction, VT 05452.

20. Upon further investigation, it was discovered that at least some of the names and addresses being used for the return addresses by Djeneba Bent belonged to individuals on the sex offender registry. It is suspected that the names and addresses of sex offenders are used on the return address to conceal her identity.

21. I also know from my training and experience the following:

a. Drug traffickers mailing controlled substances frequently use U.S. Postal Service Priority Mail Express and Priority Mail services to ship unlawful controlled substances, and the recipients of those unlawful drugs often use U.S. Postal Service Priority Mail Express and Priority Mail services to ship the proceeds of the illegal sale of controlled substances. These controlled substances and the proceeds of the illegal sale of controlled substances are often found during parcel investigations and interdictions.

b. Drug traffickers use U.S. Postal Service Priority Mail Express and Priority Mail services because of the reliability of delivery, speed of delivery, low cost, the customer's ability to track the package's shipment online; as well as the low risk of detection by law enforcement. Shippers using Priority Mail Express and Priority Mail services pay for the benefit of being able to confirm the delivery of the parcel by checking the U.S. Postal Service internet website or calling a toll free number.

c. Drug traffickers who mail controlled substances, and the drug purchasers who send payment in the form of cash or other drugs, often use false or incomplete information in labeling the parcels, as well as dated information. In this way, drug traffickers can distance themselves from the package containing controlled substances or from the proceeds of the sale of the controlled substances in the event the package is intercepted by law enforcement.

#### CONCLUSION

22. I respectfully submit that, pursuant to 18 U.S.C. § 3103a(b), there is "reasonable cause to believe that providing immediate notification of the execution of the warrant may have an adverse result." Providing notice to the anticipated recipients of the Subject Parcels would seriously jeopardize the ongoing investigation. Depending on the results of the search, law

enforcement will be considering an undercover delivery of one or more of the packages, and the possibility of additional search warrants. A disclosure would give subjects of the investigation an opportunity to destroy evidence, change patterns of behavior, notify co-conspirators, conduct financial transactions to hide assets, and/or flee from prosecution.

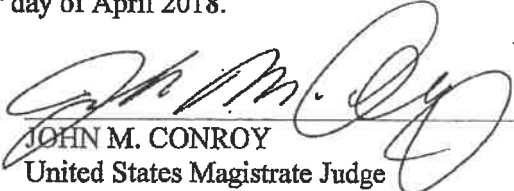
23. It is further requested that the Court authorize execution of this warrant at any time of day or night, as the Subject Parcels are in law enforcement custody.

24. Based on the foregoing, I believe that there is probable cause to search the six Subject Parcels for evidence or instrumentalities of violations of 21 U.S.C. §§ 841(a)(1) and 846.

Dated at Burlington, in the District of Vermont, this 3<sup>rd</sup> day of April 2018.

  
JONATHAN DUNHAM  
U.S. Postal Inspector

Subscribed and sworn to before me this 3<sup>rd</sup> day of April 2018.

  
JOHN M. CONROY  
United States Magistrate Judge  
District of Vermont